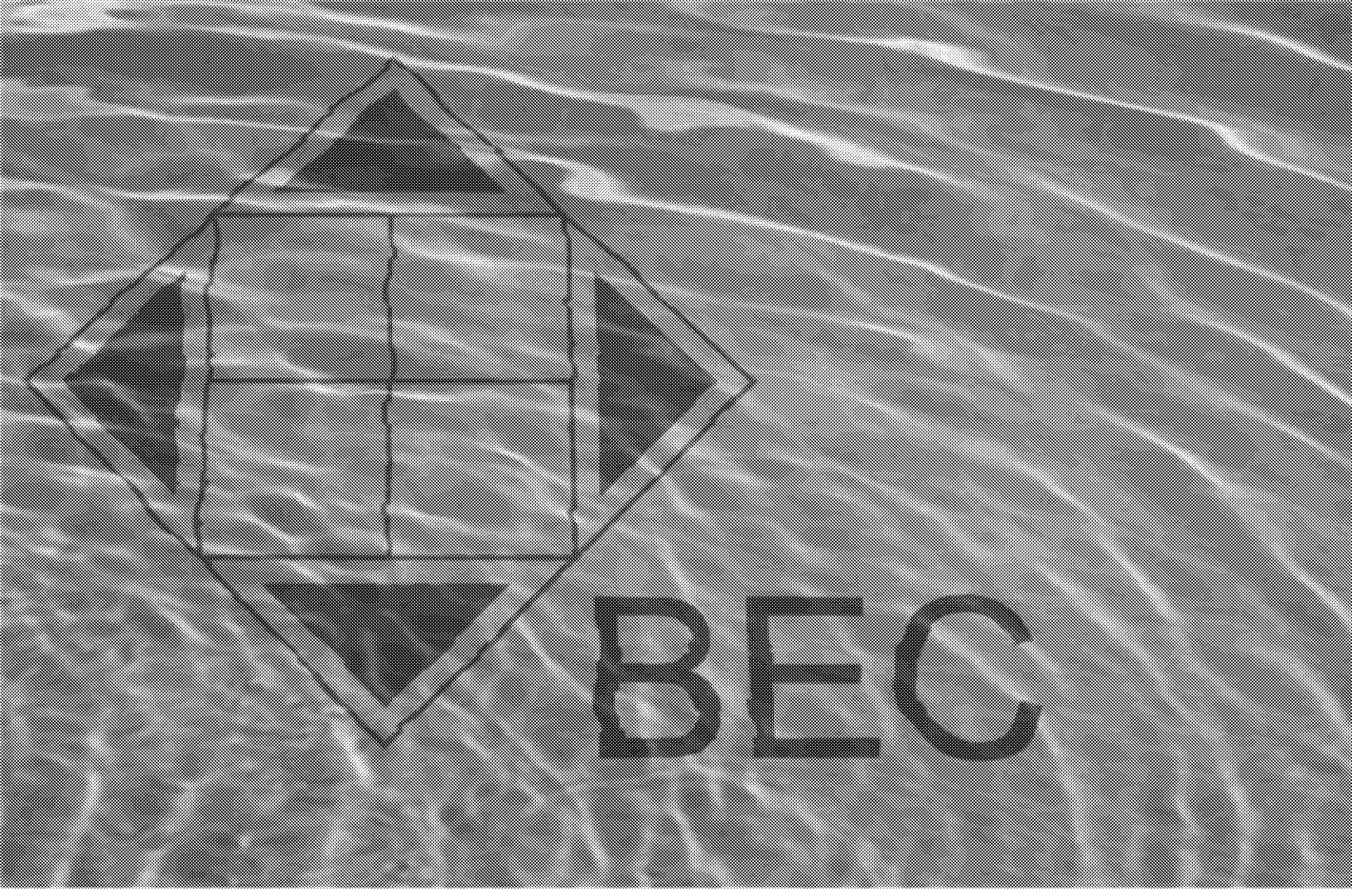

SHALLOW SOIL REMOVAL WORKPLAN

Prepared for:

Slaughter, Reagan & Cole, L.L.P.

Site Name/Location:

206 & 210 W. Slauson Avenue
Los Angeles, CA 90003

September 10, 2019

Bowyer Environmental Consulting
17011 Beach Boulevard, Suite 900
Huntington Beach, CA 92647
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F: 714-494-1912

SHALLOW SOIL REMOVAL WORKPLAN
206 & 210 W. Slauson Avenue
Los Angeles, California 90003

BEC Project No: 580101

September 10, 2019

Prepared For:
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The material and data in this report were prepared by and/or under the supervision and direction of the undersigned.

Date 09/10/19
Alan A. Malagon, MSE, E.I.T.
Staff Engineer
Bowyer Environmental Consulting, Inc.

PROFESSIONAL GEOLOGIST * STATE OF CALIFORNIA * BRETT BOWYER No. 5720

Date 9/10/19
Brett H. Bowyer, P.G.
Principal
Bowyer Environmental Consulting, Inc.

LIST OF FIGURES

1.0 *INTRODUCTION*

At the request of Michael Lebow, as legal advisor to Edward, Don, Scott and Paul Devore (collectively referred to as the "Devores"), Bowyer Environmental Consulting, Inc. (BEC) has prepared this Work Plan to implement a shallow soil Removal Action (RA) at and near the property owned by the Devores. The subject property is located at 206 and 210 W. Slauson Avenue in Los Angeles, California (Site) as shown on Figure 1.

1.1 *OBJECTIVES*

The primary objectives of the RA are to:

- Remove soil within the upper 10 feet that contains concentrations in excess of direct exposure risk-screening criteria.
- Limit the potential for gasoline-related compounds in soil from becoming mobilized during future runoff events.

The planned RA is intended to meet the remaining requirements the United States Environmental Protection Agency Emergency Response Program (USEPA-ERP), which is the lead agency in association with the emergency response. The work is also being done in compliance with requirements from the State of California Los Angeles Regional Water Quality Control Board (RWQCB). It is anticipated that following the completion of the RA and based on the post RA confirmation sampling results, the USEPA-ERP will determine that no further work is required in association with the emergency response effort. In addition, it is anticipated that the RWQCB will issue a No Further Action Letter for shallow soil (Shallow Soil NFA), based on the continued use of the Site for residential (216 W. Slauson) and commercial/industrial (206 W. Slauson) purposes. Following the issuance of the Shallow Soil NFA, the Devores shall continue to address soil vapor conditions, as necessary to meet the requirements of the RWQCB.

1.2 *WORKPLAN ORGANIZATION*

This Workplan is organized into the following primary sections:

- Section 1 summarizes the objectives and organizational framework for this Workplan;

- Section 2 provides a summary of the Site setting, a summary of the emergency response activities conducted to date and a summary of the environmental investigation results;

- Section 3 describes the scope of the field program;

- Section 4 presents a proposed implementation schedule;

- Section 5 describes the limitations associated with this document; and

- Section 6 presents a list of referenced documents.

2.0 *SITE BACKGROUND*

The Site is a light commercial/industrial parcel developed with an asphalt-paved parking lot and a billboard structure in the northeast corner of the property. The Site consists of approximately 0.24-acres of land located approximately three miles south of downtown Los Angeles and 1,000 feet east of the Harbor (I-110) Freeway. Slauson Avenue is located directly north of Site and a seldom used Burlington Northern Santa Fe Railroad right-of-way is located on the north side of Slauson Avenue. Adjacent land west, east and south of the property is used for single and multi-family residential purposes. BEC's understanding of current nearby property use is depicted on Figure 2.

Based on available city directories (BEC, April 29, 2019), the Site has been associated with what appears to be private entities and small business since at least 1924. The current lease at 210 W. Slauson Parcel A (which is shown as 210 Slauson on Figure 2) is held by Karlen Galstyan, doing business as (dba) KG Road Services. The current lease at 206 W. Slauson Parcel B (which is shown as 206 Slauson on Figure 2) is held by Byung Chun Choung.

2.1 *GEOLOGY/HYDROGEOLOGY*

The site is situated within the Coastal Plain of the Los Angeles Basin. The Los Angeles Basin is bounded by the Santa Ana Mountains to the east, the Santa Monica Mountains and Puente Hills to the north, and the Pacific Ocean to west and south. The site vicinity is underlain (at depth) by the Lakewood Formation. This formation is comprised of marine and continental sedimentary deposits that are overlain by Pleistocene and Recent Age alluvium. According to available regional hydrogeologic reports (California Department of Water Resources, June 1961), the top of the Exposition Aquifer is at a depth of approximately 50 feet below ground surface (bgs).

Based on an investigation performed at a former Shell service station located approximately 350 feet west of the Property (306 W. Slauson Avenue), as of 2015 the depth to water in the area was approximately 105 feet and groundwater flowed towards the north. The information from this nearby recent investigation is believed to be representative of current conditions at the Site.

2.2 *DESCRITION OF RELEASE AND PREVIOUS EMERGENCY RESPONSE ACTIVITIES*

According to available media reports, the Los Angeles City Fire Department (LAFD) responded to a call that reported the smell of gas near the Property at approximately 7:45 AM on March 17th, 2019. According to an investigation performed by the LAFD, sparks from a rotary saw that an LAFD firefighter used to cut the lock at the Site caused vapors to ignite from a potentially leaking 9,000-gallon gasoline tanker. The subsequent fire damaged the original tanker, two trailers and a tracker that were parked on the Site. A neighboring residential home located due west of the property (216 W. Slauson) caught fire and was allegedly also damaged.

The Devores had no prior knowledge of the presence of the gasoline tanker. The Site was leased at the time to Karlen Galstyan dba KG Road Services. According to the lease, the Site was to be used for truck and vehicle storage and no other use. In addition, the lease states "Under no circumstances shall lessee store any toxic chemical on the Premises."

The City of Los Angeles contacted Clean Harbors to assist in the emergency response activities. Clean Harbors was on the property to assist in the cleanup and containerization of the waste once the fire was extinguished. Clean Harbors vacuumed up approximately 1,600 gallons of liquid from the Site and containerized it in a frac tank on Site. In addition, Clean Harbors applied absorbent material to the ground to collect additional free liquids. The absorbent material was then collected along with miscellaneous debris and placed into eight 55-gallon drums and one 20-cubic yard bin. Additionally, a tractor trailer that was parked at the Site leaked hydraulic fluid, approximately 35 gallons of which was placed into a 55-gallon drum. Clean Harbors decontaminated off-site storm drains and set up sand bag barriers to limit the flow of released material during future storm events. Clean Harbors also covered the eastern portion of the property at 216 Slauson area where the product had migrated onto bare soil with visqueen plastic.

The solid and liquid materials recovered during the initial emergency response were sampled and analyzed for volatile organic compounds (VOCs) and total petroleum hydrocarbons (TPH) – gasoline range organics (GRO). Composite samples were also collected from the 20-cubic yard bin and from the 55-gallon drums and analyzed for TPH – diesel range organics (DRO), TPH motor oil-range organics (ORO), CAM metals, and polychlorinated hydrocarbons (PCBs). Results indicated that the

containerized solid material had the following concentrations of these constituents:

- Benzene at up to 15 milligrams per kilogram (mg/kg);
- Toluene at up to 600 mg/kg;
- Ethylbenzene at up to 230 mg/kg;
- Total xylenes at up to 2,560 mg/kg;
- GRO at up to 14,000 mg/kg;
- DRO up to 33,000 mg/kg;
- ORO up to 35,000 mg/kg; and
- Metals and PCBs were either non-detect or present at low concentrations.

The containerized water also exhibited detectable concentrations of these compounds (BEC, April 29, 2019). These results were consistent with records from the emergency response activities and support the conclusion that stored gasoline was released, residuals of which were present in the containerized solids and liquids. There also appears to be a minor amount of diesel and motor oil range organics solids, which may be related to releases from the engines of vehicles that were damaged during the fire. Other than VOCs that are typically related to petroleum hydrocarbons, no other compounds were present at levels of concern within the containerized samples.

2.3 *ENVIRONMENTAL INVESTIGATION*

An environmental investigation was performed by BEC between June 17 and July 19, 2019, in order to define the magnitude and vertical/lateral limits of gasoline and other petroleum hydrocarbon impacts to soil and soil gas due to the recent release of gasoline, associated fire and follow up emergency response activities. This work consisted of the following tasks:

- Drilling and sampling nineteen (19) soil borings (S-1 through S-10, SV-1 through SV-7, SV-2A, and SV-3A) and the collection/analysis of soil samples from 0.5, 2.5 and 5.0 feet bgs;

- Drilling and sampling seven (7) of the 19 soil borings (SV-1 through SV-7) to a total depth of 15.0 feet bgs and the collection/analysis of soil samples from 10.0 and 15.0 feet:

- Drilling and sampling two (2) of the 19 soil borings (SV-2A and SV-3A) to a total depth of 60.0 feet bgs and the collection/analysis of soil samples at five-foot intervals to a total depth of 60.0 feet;

- Installation, sampling and analysis of soil vapor probes at seven (7) locations (SV-1 through SV-7) at depths of 5.0 and 15.0 feet bgs; and

- Installation, sampling and analysis of soil vapor probes at two (2) locations (SV-2A and SV-3A) at depths of 30 and 50 feet bgs.

The collected soil samples were analyzed for VOCs via United States Environmental Protection Agency (EPA) Method 8260B, as well as GRO, DRO, and ORO by EPA Method 8015M. Soil vapor samples were also analyzed for VOCs and GRO by similar methods. The soil and soil vapor sampling locations are shown on Figure 3. The results are detailed in the Environmental Investigation Report (BEC, August 8, 2019) and are summarized below:

- Shallow soil along the property boundary of 210 and 216 Slauson (SV-2, S-3, SV-3 and S-6) has been impacted by gasoline and related VOCs at concentrations that exceed human health screening criteria. The vertical extent of these impacts varies from 5.0 to greater than 10.0 feet bgs. The horizontal impact has been defined to the north, east and south. Further investigation to the west was not possible due to the presence of the existing structure. The locations of impacted soil within the top 10.0 feet is presented on Figure 4.

- A separate smaller are of soil impacted with gasoline and related VOCs is present in the central eastern portion of the Site (SV-5), at the former reported location of the gasoline tanker. The vertical extent of impacts in this area appear to be limited to less than 5.0 feet and the horizontal extent also appears to be limited based on the available data. The location of this area is presented on Figure 4.

- Gasoline-related compounds have diffused in the vapor phase over a wider area to the north and south and to greater depths (up to 50 feet) than the absorbed-phase compounds present in shallow soil.

The presence of a clay layer at depths of 15 to 23-28 feet likely slowed the vertical movement of absorbed gasoline constituents.

In addition, the investigation report (BEC, August 8, 2019) recommended that impacted shallow soil above 10.0 feet (as shown on Figure 4) should be excavated and removed from the Site, to prevent potential future mobilization of gasoline-related compounds in stormwater, and to limit future human health risks associated with direct contact with impacted soil.

3.0 SCOPE OF WORK

The work will be implemented in the phases as outlined below:

- Planning/Permitting;
- Phase One – Shallow Soil Excavations (AOC-1 and AOC-2);
- Phase Two – Shallow Soil Excavations (AOC-1A and AOC-1B);
- Phase Three – Additional Excavations (As Needed) and Backfilling;
- Completion Report.

The field work will be done in three (3) discrete phases in order to facilitate the work in a safe and orderly fashion and minimize the potential impact to current lessees and the public. The primary objective of this effort is to remove soil within the upper 10.0 feet that represents a potential risk of direct exposure to future commercial/industrial and/or construction workers. Soil that exceeds the Department of Toxic Substances Control (DTSC) Screening Levels (SLs) and EPA Regional Screening Levels (RSLs) is to be targeted for removal. Based on these criteria, the chemical-specific target levels for the compounds of concern VOCs observed in the shallow soil are:

- Benzene – 330 micrograms per kilogram (µg/kg);
- Ethylbenzene – 5,800 µg/kg;
- Naphthalene – 2,000 µg/kg;
- 1,2,4-Trimethylbenzene – 300,000 µg/kg;
- 1,2,5-Trimethylbenzene – 270,000 µg/kg;
- m,p-Xylene – 550,000 µg/kg;
- o-Xylene – 650,000 µg/kg;
- GRO – 85 mg/kg; and
- DRO – 96 mg/kg.

During the recent Site investigation, only GRO and benzene were observed above the screening criteria. Based on the available data, the area impacted with benzene and GRO in excess of cleanup criteria within the top 10.0 feet of soil, as well as the planned excavation area, are presented on Figure 4.

The excavation will take place within two distinct areas of concern (AOCs) identified during the site investigation program. The first area (AOC-1) spans the northern property boundary of 210-216 W. Slauson and includes soil borings SV-2, S-3, SV-3 and S-6. The second area (AOC-2) is located in the eastern portion of 210 W. Slauson at soil boring SV-5. The locations and proposed depths of the excavations at each of these AOCs are provided on Figure 4.

The initial phase of excavation (Phase One) will remove soil to a total depth of 4.0 feet bgs in both areas AOC-1 and AOC-2, as shown on Figure 5. Following the completion of this initial excavation, a series of confirmation samples will be collected within each AOC. The proposed confirmation sampling locations are provided on Figure 5.

Phase Two of the shallow soil removal will take place immediately after the first phase. As shown on Figure 6, two areas within AOC-1 (AOC-1A and AOC-1B) will be excavated to depths of 7.0 feet and 10.0 feet, respectively. Following these excavations, a series of confirmation samples will be collected within each AOC. The proposed confirmation sampling locations are provided on Figure 6.

Based on the results of confirmation sampling from both phases, it is possible that additional rounds of excavation and sampling will be required to reach the stated target clean-up levels in the upper 10.0 feet of soil. The additional excavation and sampling would be performed as part of Phase Three. Once the final excavations are complete and target clean-up levels have been achieved, all AOCs will be backfilled with clean soil and/or appropriate fill material.

A final Completion Report will be prepared after backfilling is complete. The Completion Report will be submitted to the EPA and RWQCB for review and approval. Upon achieving the objectives of this RA, it is anticipated that the USEPA-ERP will issue a notice that requirements to protect the waters of the United States have been met and that the emergency response activities are complete. In addition, it is anticipated that the RWQCB will issue Shallow Soil NFA, based on the continued use of the Site for residential (216 W. Slauson) and commercial/industrial (206

W. Slauson) purposes. Following the issuance of the Shallow Soil NFA, the Devores shall continue to address soil vapor conditions, as necessary to meet the requirements of the RWQCB.

Details regarding the procedures to be implemented are summarized in the following subsections.

3.1 *PLANNING, PERMITTING AND SUPPORT ACTIVITIES*

Prior to implementing the field work, BEC shall procure permits from any jurisdictional agencies as required. At this time, BEC anticipates a Rule 1166 VOC Soil Mitigation Plan will be obtained from the South Coast Air Quality Management District (SCAQMD), and a Grading Permit will be obtained from the City of Los Angeles Department of Building and Safety (LADBS).

A Site-specific Health and Safety Plan (HASP) will be developed and used by all personnel during field services. BEC anticipates that an Occupational Safety and Health Administration (OSHA) Level D Personal Protective Equipment (PPE) work uniform consisting of hard hats, safety glasses, protective gloves, and steel-toed boots will be required by all personnel in the work area. All field activities will be conducted under the supervision of a California-licensed Professional Geologist.

BEC will coordinate site access prior to beginning any excavation activities specified in this workplan. BEC will also contact Underground Service Alert (USA) to arrange for underground utility markings at the Site at least 2 business days prior to beginning excavation activities. For this Workplan, it is assumed that all above-ground structures (including the residence located at 216 W. Slauson) will be removed prior to excavation, and that the surface will be either bare asphalt or bare soil.

3.2 *AIR QUALITY AND DUST MONITORING*

BEC will conduct environmental and dust monitoring procedures during all major earthwork conducted at the Site. In addition to the SCAQMD Rule 1166 Soil Mitigation Plan discussed above, the procedures to be followed will comply with Rule 402 Nuisance (odor control) and Rule 403 Fugitive Dust.

It is anticipated that concentrations in excess of 1,000 parts per million (PPM) may be observed during the excavation of the impacted soil. It is currently estimated that approximately 242 cubic yards of soil will be removed during the two planned phases excavation phases. Additional soil may be excavated if warranted, during Phase Three. Given these factors, a Site-Specific Various Location Rule 166 Contaminated Soil Mitigation Plan (SCAQMD Soil Mitigation Plan) will be developed and submitted to the SCAQMD for approval in advance of the excavation. Under this plan, it is anticipated that excavated soil will be directly loaded in trucks, moistened with water, covered, and transported immediately off site to a pre-approved treatment facility. Once the SCAQMD Soil Mitigation Plan has been approved, notification will be made to the SCAQMD Executive Officer a minimum of 24 hours in advance of commencing excavation activities. In addition, if VOC concentration in excess of 50 and/or 1,000 PPM are observed, additional notifications to the SCAQMD Executive officer will be made as required under the SCAQMD Soil Mitigation Plan.

In compliance with Rule 1166 requirements, all excavated soil will be monitored at least once every 15 minutes using an organic vapor analyzer (OVA). The monitoring will take place at the face of the active excavation at a distance of no more than 3 inches from the freshly excavated soil. In addition to this procedure, an UltraRAE 3000 with a RAESep benzene tube will be utilized to monitor the breathing zone for benzene concentrations. Based on these reading, mitigation measures may be implemented if warranted. If OVA readings in excess of 50 PPM are encountered, or benzene concentrations in excess of 0.1 PPM are encountered, work will be suspended, and the affected work area and load of soil shall be sprayed with water. Work will not proceed until readings are reduced to below the thresholds.

In addition to monitoring the excavation and loading activities, perimeter monitoring will be conducted to demonstrate compliance with Rule 403 Fugitive Dust. In order to verify compliance, two identical dust monitors will be placed upwind and downwind on Site each day. Both units will be calibrated using the zero-filter at the beginning of each work day and set to log measurements at one-minute and two-minute intervals. A weather station will be set up on Site to monitor wind direction and speed.

Acceptable criteria to demonstrate compliance is summarized as follows:

- Particulate Matter 10 (PM_{10}) – This refers to particulates that are 10 micrometers and smaller in size. Downwind concentrations should

not average more than 10.4 micrograms per cubic meter ($\mu g/m^3$) above the upwind monitor concentrations over a 24-hour period per Rule 403.

- $PM_{2.5}$ – This refers to particulates that are 2.5 micrometers and smaller in size. Downwind concentrations should not average more than 10.4 $\mu g/m^3$ over upwind monitor over a 24-hour period per Rule 403.

3.3 *PHASE ONE – SHALLOW SOIL EXCAVATION TO 4.0 FEET*

As described in preceding sections, the planned excavation has been divided into two phases in order to minimize impacts to the properties and to allow the work to be implemented in a safe manner. There are two AOCs present in shallow soil at the Site: AOC-1 is located in 210 and 216 W. Slauson Ave., and AOC-2 is located in 210 W. Slauson. The locations of these AOCs and the scope of work associated with the Phase One excavation is provided on Figure 5.

All excavation activities will be performed with standard excavation equipment (backhoe and loader) and safety precautions as defined in the HASP. All equipment will be decontaminated using a high-pressure washer prior to work commencement, and again following the completion of excavation activities. Asphalt will be broken, removed, and stockpiled for proper disposal prior to digging.

During Phase One, both AOC-1 and AOC-2 will be excavated to a total depth of 4.0 feet. Excavations will be performed according to LADBS standards and in compliance with all necessary grading permits, in order to maintain safe and effective working procedures. Approximately 180 cubic yards of soil are anticipated to be removed from AOC-1, and approximately 17 cubic yards of soil are expected be removed from AOC-2 during this phase. The excavated soil will be direct-loaded into end dumps for proper off-Site disposal. It is anticipated that the excavated soil will be transported off-Site to a designated non-hazardous waste disposal facility. Documentation regarding the soil disposal will be included in the final Completion Report.

Following the excavations, a total of twenty-three (23) initial confirmation samples will be collected from AOC-1 and a total of five (5) confirmation samples will be collected from AOC-2. The approximate locations of the confirmation samples are shown on Figure 5. Samples will be collected

from the excavation sidewalls every 10 linear feet, and from the excavation floor once per every 100 square feet. Floor samples will not be collected from the areas designated AOC-1A and AOC-1B, since these areas will be further excavated during the second phase of work described below. The samples will be collected using Terracore® sampling techniques (EPA Method 5035) and in glass jars and analyzed for VOCs via EPA Method 8260B and TPH by EPA Method 8015M.

3.4 *PHASE TWO – SHALLOW SOIL EXCAVATION TO 7.0 AND 10 FEET*

The second phase of soil excavations will begin after the completion of the first phase. These excavations are planned to take place at areas AOC-1A and AOC-1B and will extend to a total depth of 7.0 feet and 10.0 feet, respectively. The locations of these areas are shown on Figure 6.

Excavations will be performed according to identical standards as in Phase One in order to maintain safe and effective working procedures. Approximately 20 cubic yards of soil are anticipated to be removed from AOC-1A, and approximately 25 cubic yards of soil are expected to be removed from AOC-1B. The excavated soil will be stored, transported and disposed of in a similar manner to the soil generated during the Phase One excavations.

Following the excavations, a total of eight (8) confirmation samples will be collected from AOC-1A and a total of five (5) confirmation samples will be collected from AOC-1B. The approximate locations of the confirmation samples are shown on Figure 6. Samples will be collected from the excavation sidewalls every 10 linear feet, and from the excavation floor once per every 100 square feet. The samples will be collected and analyzed for VOCs and TPH by similar methods as in Phase One.

3.5 *PHASE THREE – ADDITIONAL EXCAVATIONS (AS NEEDED) AND BACKFILLING*

Based on the results of the confirmation sampling, further excavations may be performed if residual elevated concentrations of VOCs and/or TPH are identified at depths between 0.5 and 10.0 feet bgs. These excavations will be performed according to the standards and methods described in the preceding sections. Confirmation samples will be collected at the spacing intervals described above and analyzed via similar methods as in Phases One and Two. This phase will continue until all

confirmation samples at depths of 10.0 feet and above are within the target clean-up standards for soil.

Once all of the identified soil containing impacts above 10.0 feet bgs has been removed, all AOCs will be backfilled with clean soil and/or appropriate fill material.

3.7 REPORTING

A final Completion Report will be prepared after backfilling is complete. The Completion Report will be submitted to the EPA and RWQCB for review and approval. Upon achieving the objectives of this RA, it is anticipated that the USEPA-ERP will issue a notice that requirements to protect the waters of the United States have been met and that the emergency response activities are complete. In addition, it is anticipated that the RWQCB will issue Shallow Soil NFA, based on the continued use of the Site for residential (216 W. Slauson) and commercial/industrial (206 W. Slauson) purposes. Following the issuance of the Shallow Soil NFA, the Devores shall continue to address soil vapor conditions, as necessary to meet the requirements of the RWQCB.

4.0 IMPLEMENTATION SCHEDULE

The implementation schedule is based in part of the completion of the demolition of the structure at 216 W Slauson and the acquisition of any necessary permits from the City of Los Angeles and the SCAQMD. Assuming these prerequisites are completed within 30 days and also assuming that the USEPA and RWQCB approve this workplan within a similar time frame, we anticipate the initiation of this work on October 14th, 2019. Field work will take approximately 15 working days and the final completion report will be prepared over an additional 15 working day period. Based on this schedule, the draft completion report should be available by November 15, 2019.

5.0 *LIMITATIONS*

This Workplan was based partially on information supplied to BEC from outside sources and other information that is in the public domain. Documentation for the statements made in this Workplan is on file at BEC's offices in Long Beach, California, or available on the SWRCB's GeoTracker website at http://geotracker.waterboards.ca.gov. BEC makes no warranty as to the accuracy of statements made by others that may be contained in the Workplan, nor are any other warranties or guarantees, expressed or implied, included or intended by the Workplan, except that it has been prepared in accordance with the current generally accepted practices and standards consistent with the level of care and skill exercised under similar circumstances by other professional consultants or firms performing the same or similar services. Because the facts forming the basis for this Workplan are subject to professional interpretation, differing conclusions could be reached. BEC does not assume responsibility for the discovery and elimination of hazards that could possibly cause accidents, injuries, or damage. Compliance with submitted recommendations or suggestions does not assure elimination of hazards or the fulfillment of the client's obligation under local, state, or federal laws or any modifications or changes to such laws. It must be recognized that environmental investigations are inherently limited in the sense that conclusions are drawn, and recommendations developed from information obtained from limited research and Site investigation. All Site subsurface conditions were not field investigated as part of the services described in this Workplan. Additionally, the passage of time may result in a change in the environmental characteristics at this Site and surrounding properties. This Workplan does not warrant against future operations or conditions, nor does this warrant operations or conditions present of a type or at a location not addressed in this Workplan. This Workplan is for the exclusive use of Devores. No other party shall have any right to use or rely on this Workplan or any related Workplan-related service provided by BEC without the prior written authorization of BEC. Any authorized third-party use of this Workplan shall be: subject to the terms and conditions governing the work in the Agreement between Devores and BEC; limited by the exceptions and limitations in this Workplan; and with the acknowledgment that actual Site conditions may change with time, and that hidden conditions may exist at the Site that were not discoverable within the client-authorized scope of the preparation of the Workplan. Any unauthorized release or misuse of this Workplan shall be without risk or liability to BEC. None of the work performed hereunder shall constitute or be represented as a legal opinion

of any kind or nature but may be considered a representation of findings based on the cited documents and information.

6.0 REFERENCES

Bowyer Environmental Consulting (BEC), 2019. *Investigation Workplan,* April 29.

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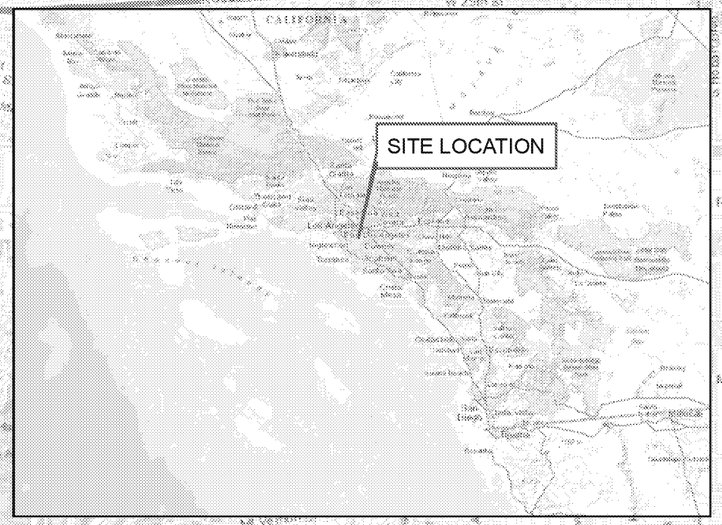
Figures



SITE LOCATION

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community

N

0 0.5 1 Miles

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SITE LOCATION

206 and 210 W. Slauson Avenue, Los Angeles, California

Project No. 580101

Figure 1

ED_012956_00001659-00024

LEGEND

- APPROXIMATE SITE PROPERTY BOUNDARY
- APPROXIMATE OFF-SITE PROPERTY BOUNDARY

0' 50' 100' 200'

N

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BEC

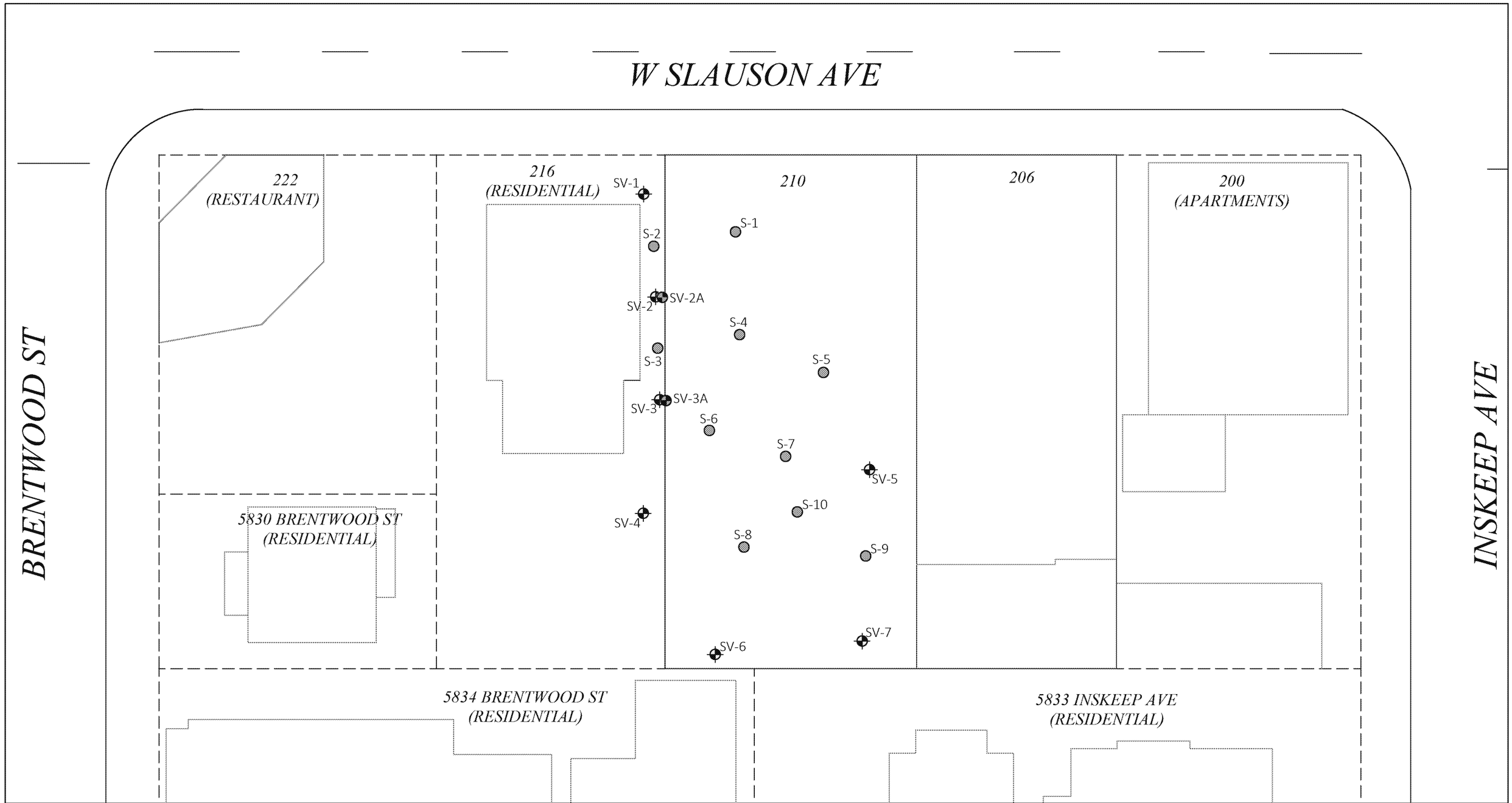
VICINITY MAP

206 and 210 W. Slauson Avenue, Los Angeles, California

Project No. 580101

Figure 2

ED_012956_00001659-00025



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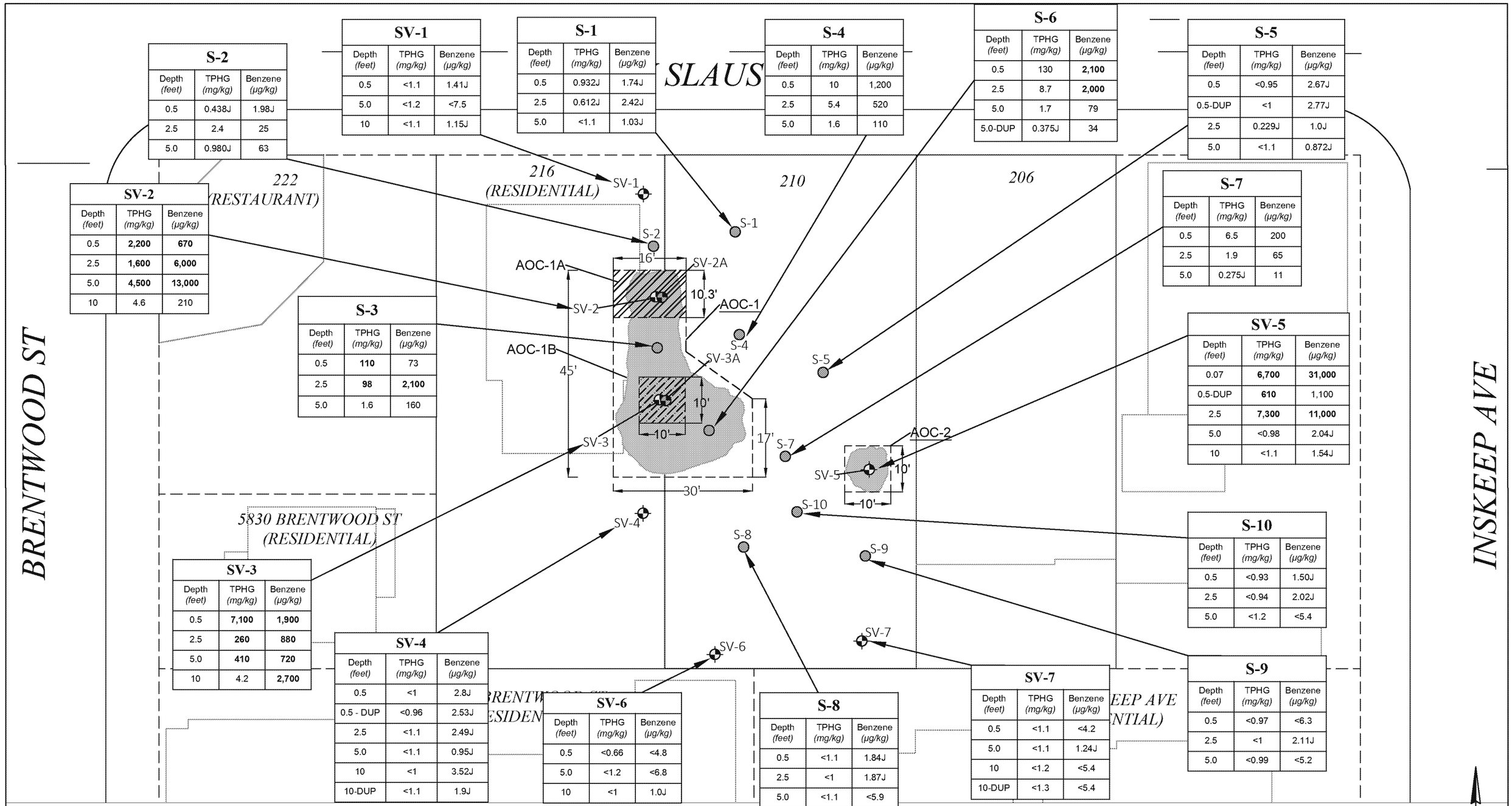
SOIL AND SOIL VAPOR BORING LOCATIONS

206 & 210 W. Slauson Avenue, Los Angeles, California

Project No. 580101

Figure 3



S-2		
Depth *(feet)*	TPHG *(mg/kg)*	Benzene *(µg/kg)*
0.5	0.438J	1.98J
2.5	2.4	25
5.0	0.980J	63

SV-1		
Depth *(feet)*	TPHG *(mg/kg)*	Benzene *(µg/kg)*
0.5	<1.1	1.41J
5.0	<1.2	<7.5
10	<1.1	1.15J

S-1		
Depth *(feet)*	TPHG *(mg/kg)*	Benzene *(µg/kg)*
0.5	0.932J	1.74J
2.5	0.612J	2.42J
5.0	<1.1	1.03J

S-4		
Depth *(feet)*	TPHG *(mg/kg)*	Benzene *(µg/kg)*
0.5	10	1,200
2.5	5.4	520
5.0	1.6	110

S-6		
Depth *(feet)*	TPHG *(mg/kg)*	Benzene *(µg/kg)*
0.5	130	**2,100**
2.5	8.7	**2,000**
5.0	1.7	79
5.0-DUP	0.375J	34

S-5		
Depth *(feet)*	TPHG *(mg/kg)*	Benzene *(µg/kg)*
0.5	<0.95	2.67J
0.5-DUP	<1	2.77J
2.5	0.229J	1.0J
5.0	<1.1	0.872J

SV-2		
Depth *(feet)*	TPHG *(mg/kg)*	Benzene *(µg/kg)*
0.5	**2,200**	**670**
2.5	**1,600**	**6,000**
5.0	**4,500**	**13,000**
10	4.6	210

S-7		
Depth *(feet)*	TPHG *(mg/kg)*	Benzene *(µg/kg)*
0.5	6.5	200
2.5	1.9	65
5.0	0.275J	11

S-3		
Depth *(feet)*	TPHG *(mg/kg)*	Benzene *(µg/kg)*
0.5	**110**	73
2.5	**98**	**2,100**
5.0	1.6	160

SV-5		
Depth *(feet)*	TPHG *(mg/kg)*	Benzene *(µg/kg)*
0.07	**6,700**	**31,000**
0.5-DUP	**610**	1,100
2.5	**7,300**	**11,000**
5.0	<0.98	2.04J
10	<1.1	1.54J

S-10		
Depth *(feet)*	TPHG *(mg/kg)*	Benzene *(µg/kg)*
0.5	<0.93	1.50J
2.5	<0.94	2.02J
5.0	<1.2	<5.4

SV-3		
Depth *(feet)*	TPHG *(mg/kg)*	Benzene *(µg/kg)*
0.5	**7,100**	**1,900**
2.5	**260**	**880**
5.0	**410**	**720**
10	4.2	**2,700**

SV-4		
Depth *(feet)*	TPHG *(mg/kg)*	Benzene *(µg/kg)*
0.5	<1	2.8J
0.5 - DUP	<0.96	2.53J
2.5	<1.1	2.49J
5.0	<1.1	0.95J
10	<1	3.52J
10-DUP	<1.1	1.9J

SV-6		
Depth *(feet)*	TPHG *(mg/kg)*	Benzene *(µg/kg)*
0.5	<0.66	<4.8
5.0	<1.2	<6.8
10	<1	1.0J

S-8		
Depth *(feet)*	TPHG *(mg/kg)*	Benzene *(µg/kg)*
0.5	<1.1	1.84J
2.5	<1	1.87J
5.0	<1.1	<5.9

SV-7		
Depth *(feet)*	TPHG *(mg/kg)*	Benzene *(µg/kg)*
0.5	<1.1	<4.2
5.0	<1.1	1.24J
10	<1.2	<5.4
10-DUP	<1.3	<5.4

S-9		
Depth *(feet)*	TPHG *(mg/kg)*	Benzene *(µg/kg)*
0.5	<0.97	<6.3
2.5	<1	2.11J
5.0	<0.99	<5.2

LEGEND

- APPROXIMATE SITE PROPERTY BOUNDARY
- APPROXIMATE OFF-SITE PROPERTY BOUNDARY
- APPROXIMATE BOUNDARY OF CONTAMINATED SOIL
- APPROXIMATE LOCATION OF "S" BORINGS (5 FT)
- APPROXIMATE LOCATION OF "SV" BORINGS (15 FT)
- APPROXIMATE LOCATION OF "SV" BORINGS (60 FT)

NOTES:

1. BOLD = VALUE EXCEEDS SCREENING CRITERIA.
2. < = PRACTICAL QUANTITATION LIMIT (PQL) REPORTED; VALUE NOT DETECTED OR AT ABOVE THE LISTED REPORTING LIMIT.
3. J = ANALYTE DETECTED AT AN APPROXIMATE CONCENTRATION BELOW LABORATORY REPORTING LIMITS.
4. SV-1-2.5, SV-6-2.5 AND SV-7-2.5 WERE NOT ANALYZED.

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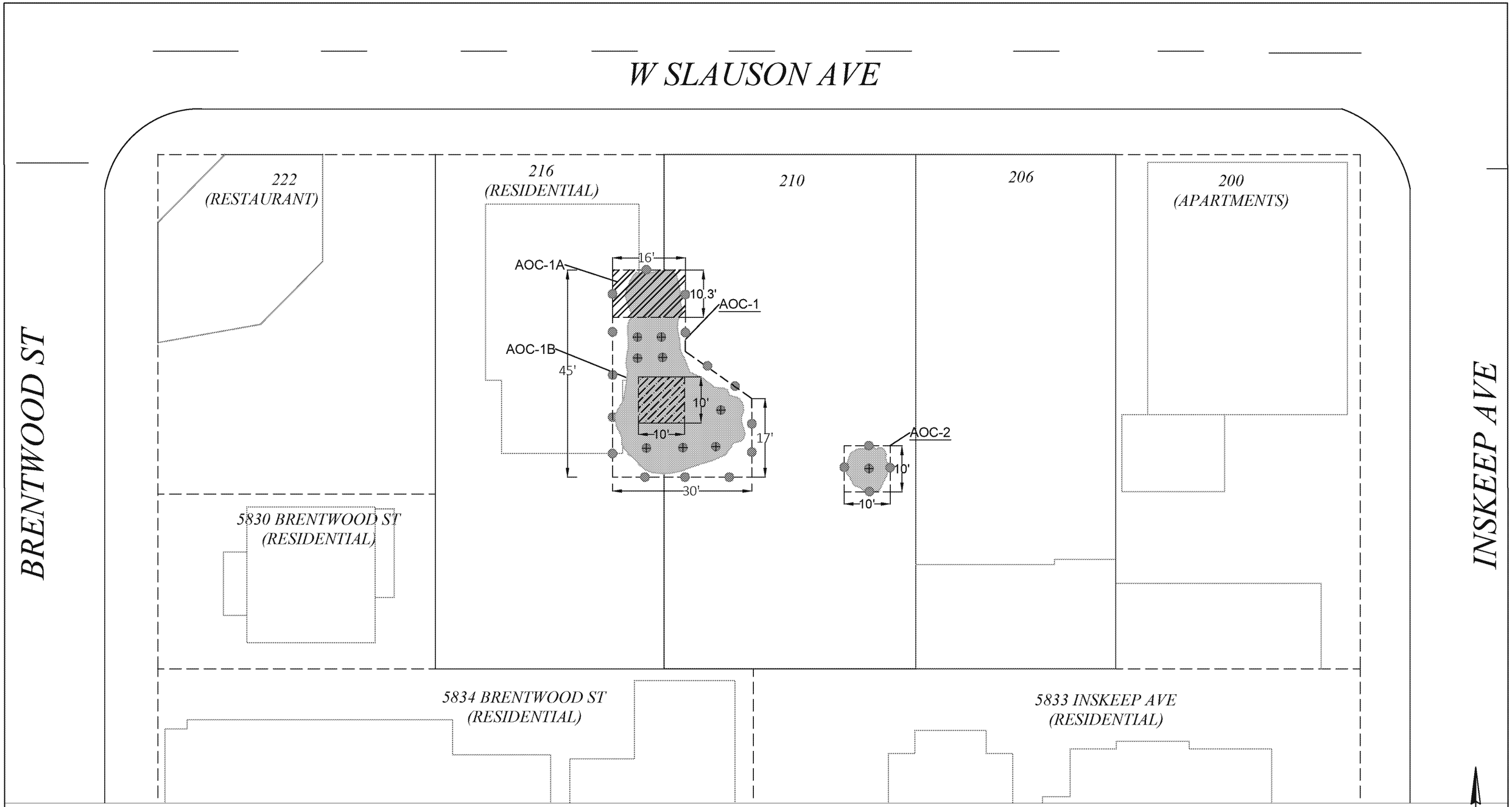
TPH-G AND BENZENE DETECTED IN SOIL FROM 0.5 TO 10 FEET

206 and 210 W. Slauson Avenue, Los Angeles, California

Project No. 580101

Figure 4



LEGEND

- APPROXIMATE SITE PROPERTY BOUNDARY
- APPROXIMATE OFF-SITE PROPERTY BOUNDARY
- APPROXIMATE BOUNDARY OF CONTAMINATED SOIL
- APPROXIMATE CONFIRMATION SAMPLING LOCATION (SIDEWALL)
- APPROXIMATE CONFIRMATION SAMPLING LOCATION (BOTTOM)

NOTES

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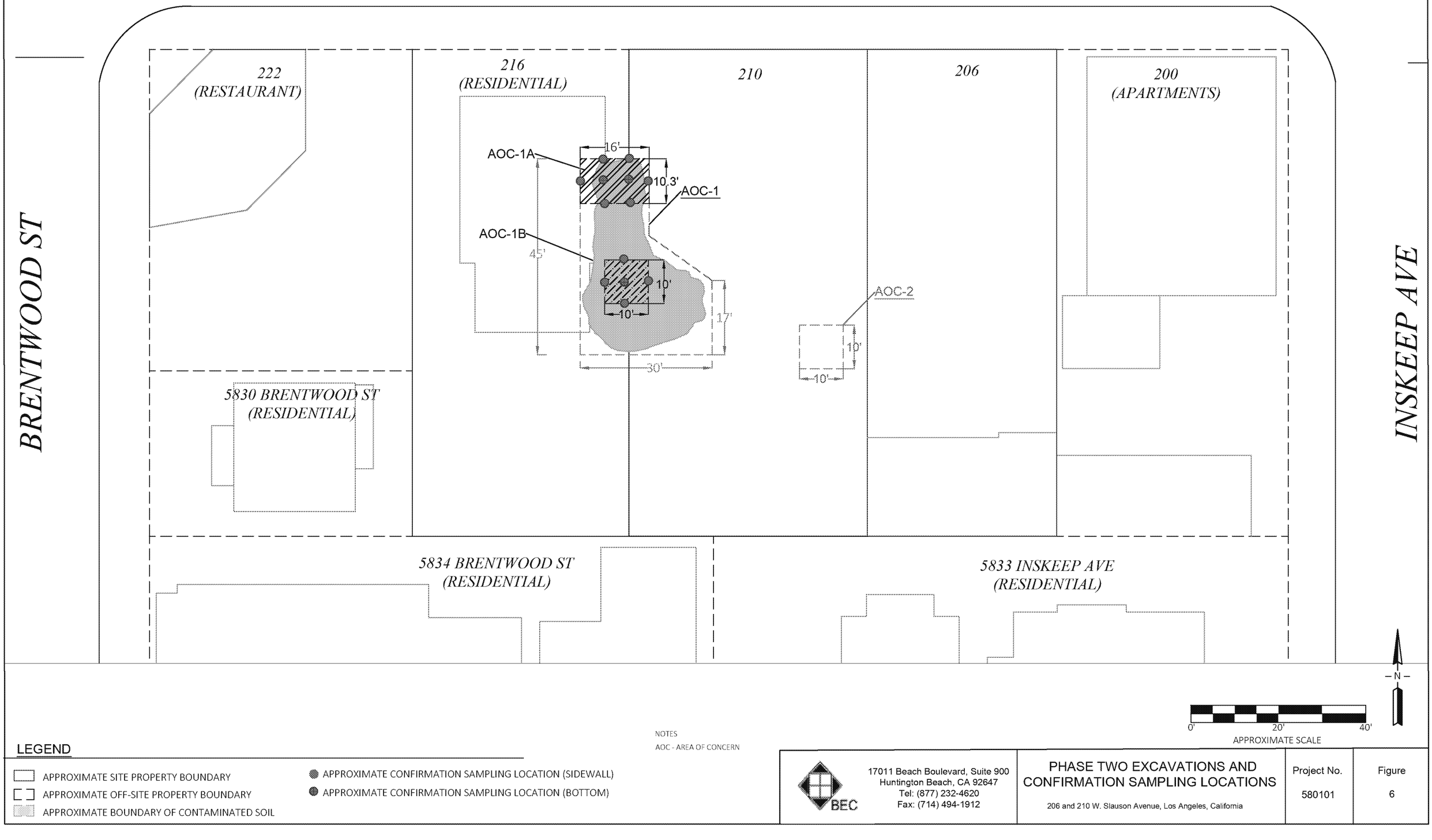
PHASE ONE EXCAVATIONS AND CONFIRMATION SAMPLING LOCATIONS

206 and 210 W. Slauson Avenue, Los Angeles, California

Project No. 580101

Figure 5



LEGEND

- APPROXIMATE SITE PROPERTY BOUNDARY
- APPROXIMATE OFF-SITE PROPERTY BOUNDARY
- APPROXIMATE BOUNDARY OF CONTAMINATED SOIL
- APPROXIMATE CONFIRMATION SAMPLING LOCATION (SIDEWALL)
- APPROXIMATE CONFIRMATION SAMPLING LOCATION (BOTTOM)

NOTES

AOC - AREA OF CONCERN

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PHASE TWO EXCAVATIONS AND CONFIRMATION SAMPLING LOCATIONS

206 and 210 W. Slauson Avenue, Los Angeles, California

Project No. 580101

Figure 6